IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RANDOLPH S. TANGLE

Plaintiff

V. : C.A. NO: 05-114 ERIE

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CITY OF ERIE, ET AL., Defendants

APPLICATION REQUEST FOR APPOINTMENT OF COUNSEL TO REPRESENT THE PLAINTIFF'S LAWSUIT LITIGATION

NOW COMES, Plaintiff, Randolph S. Tangle, in pro-se litigation "who" is a layman unlettered in the arts and science of civil law. Is now seeking this Honorable Federal Court for consideration for any errors that may occur in this civil lawsuit and submitted motions and sought support for appointment of counsel to represent him for pre-trial discovery issues, negotiation and sought relief in paperwork for pre-trial investigation stage in this civil matter at hand.

"Also," due to the severity and depth of the civil action case the Plaintiff is without financial resources at this time and unable to afford an experience lawyer to proceed with.

Plaintiff believes, it is necessary for legal assistance in order to get any fairness or reasonable chance in pro-se litigation against public employees acting in bad faith.

Because of the above reasons, it is requested that this Honorable Federal Court find cause and reason for this application request for counsel to be appointed.

Respectfully submitted,

Randolph & Tangle Randolph S. Tangle

726 Ash Street Erie, PA 16503

Date. 10-12-05

PROOF OF SERVICE

I, Randolph S. Tangle, hereby certify that I am this day serving the foregoing request for appointment of counsel to the clerk of court's office and the opposing attorney for the defendants below under civil litigation action, by first-class mail, which service satisfies the requirements of Pa.R.A.P. rule 122.

Clerk of Courts Office U.S. District Court P.O. Box 1820 Erie, PA 16507

Matthew J. McLaughlin, Esq. Erie County, Assistant Solicitor 246 West Tenth Street Erie, PA 16501

Above Counsel for Defendants: John Doe, Law Clerk and Jim Musceralla, Chief Court Reporter.

Respectfully submitted,

Randolph S. Tangle

726 Ash Street Erie, PA 16503 (Home Address)

Date: 10-12-05